



May 24, 2021

Dr. Scott Leibsle  
Idaho State Department of Agriculture  
Idaho State Veterinarian

Mr. Lloyd Knight  
Idaho State Department of Agriculture  
Rules Review Officer

RE: IDAPA 02.04.05 Rules Governing Grade A Milk and Manufacturing Grade Milk

Dr Leibsle and Mr. Knight,

At the Idaho Dairymen's Association board meeting held on May 19, 2021 the following concerns have been identified with IDAPA 02.04.05 Rules Governing Grade A Milk and Manufacturing Grade Milk.

First we appreciate that in section 281 -01-c the language has been added back in "while being observed by a Department employee or representative". By adding the language back in we also realize that it creates a problem for ISDA to economically perform the intent of 281-1-c in the out of state labs testing Idaho milk.

To address that concern the board believes a discussion should be had on eliminating that provision for observation oversight (281-01-c) for out of state labs, to our knowledge that will impact four (4) labs. In addition, although ISDA lab accuracy is more stringent than the Federal Milk Marketing Order (FMMO) lab requirements, potentially all parties should consider allowing those out of state labs that are governed by FMMO be exempt from ISDA lab component accuracy oversight.

Lastly, with the expansion of goat operations in Idaho the Rule needs to explicitly state that IDAPA 02.04.05 section 281 only pertains to dairy facilities that pay into the butterfat assessment.

Sincerely,

A handwritten signature in black ink, appearing to read "Rick Naerebout", is written over a horizontal line.

Rick Naerebout  
Chief Executive Officer  
Idaho Dairymen's Association, Inc.